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NJ DEPT OF ENVIRONMENT & PLANNING
DIV WATER October 13, 1982
MS&E

Mr. Joseph M. Mikulka
Chief, Region IV
Enforcement & Regulatory Services
Division of Water Resources
CN-024
Trenton, New Jersey 08625

RE: In the matter of L.E. Carpenter & Company
Administrative Consent Order.

Dear Mr. Mikulka:

The following is L.E. Carpenter's assessment of how much waste plastisol remains at the L.E. Carpenter site located at 170 N. Main Street, Wharton, N. J. Included are the characteristics of such remaining material, potential hazard, and the basis for such an assessment.

FINDINGS

- (1) Excavation of the impoundment area required soil removal to a depth twice as great as estimated (8 to 12 feet) and 50% larger in area (approximately 11,000 sq. ft.) than projected by initial investigation from Wehran Engineering. This, in main part, was due to trench overflow and continued contact of soil by liquids emanating from buried drums which were ruptured during the removal process.
- (2) Based on a visual examination of the materials recovered from the impoundment, approximately 85-90% appeared to be soil. The majority of drums which were found stacked along the containment wall area of the tank farm contained liquid plastisol and solvent.
- (3) At the conclusion of the excavation, no drums or liquid plastisol waste areas were observed and the soil for the most part appeared to partially contain a dry clay like plastisol in a sporadic narrow and shallow vein so as to indicate fringe areas where previous overflow may have occurred. These areas apparently were covered by soil subsequent to plastisol overflow. Probing of these fringe areas was performed when the excavation had reached the point that it became apparent the bulk of waste plastisol was removed and only non liquid crumbly or clay like remnants remained.

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It was estimated that the residue would not represent more than 2 - 3% of the total waste in the impoundment, based on the sporadic shallow nature of the remaining material and the fact that approximately 6,000 sq. ft. at a depth of 3 or 4 feet remained in question. Removal of said material would possibly require the excavation of an additional 900 cu. yd. and probably add 20-30% to the total cost of excavation.

(4) Excavation had shown the solid waste to be above the ground water table.

L.E. Carpenter feels that it should be given some consideration in its request for employing a cost benefit principle on any remaining residue. Wehran Engineering's original study indicated no significant waste areas outside the impoundment site already excavated. Further investigation of the site was done on October 19, 1981 when Wehran Engineering excavated four exploratory backhoe test pits concurrently with the installation of monitoring well #5. As is mentioned in Wehran's report, these pits were located on a line parallel to the Rockaway River and at approximately 70 foot intervals between monitoring wells #3 and #4. Observation of the soil stratification in these pits showed no evidence of a plastisol waste. L.E. Carpenter has excavated and disposed of 3500 cu. yd. (three times original estimates) of plastisol waste and soil at a cost of approximately \$1,000,000.

One of DEP's initial concerns was that the bulk of the contamination could "break loose" and find its way to the Boonton Reservoir. This concern should now be alleviated since not only the bulk of the material has been removed, but the quality of the remaining material in the ground shows it to be solid in nature and not amenable to movement.

L.E. Carpenter feels that the ground water quality question should now be addressed as outlined in the Administrative Consent Order.

Very truly yours,

L.E. CARPENTER & COMPANY



Frank Aron
Technical Director

FCA:AMR